

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

GH AMERICA ENERGY LLC

Plaintiff,

V.

ELECTRIC RELIABILITY COUNCIL OF TEXAS, INC.; PABLO VEGAS, Chief Executive Officer of the ELECTRIC RELIABILITY COUNCIL OF TEXAS, INC.; PAUL FOSTER, BILL FLORES, CARLOS AGUILAR, LINDA CAPUANO, LORI COBOS, JULIE ENGLAND, ROBERT FLEXON, THOMAS GLEESON, PEGGY HEEG, COURTNEY HJALTMAN, and JOHN SWAINSON, Members of the Board of Directors of the ELECTRIC RELIABILITY COUNCIL OF TEXAS, INC.

Defendants.

CASE NO.1:24-CV-00648-DII

JOINT STIPULATION REGARDING TIME TO ANSWER COMPLAINT

IT IS HEREBY STIPULATED AND AGREED by and between counsel for Plaintiff GH America Energy LLC and counsel for Defendants Electric Reliability Council of Texas, Inc. (“ERCOT”), Paul Foster, Bill Flores, Carlos Aguilar, Linda Capuano, Julie England, Robert Flexon, Peggy Heeg, John Swainson, and Pablo Vegas (herein, “Certain ERCOT Board Defendants”), and unless otherwise ordered by the Court, that the time by which ERCOT shall answer or otherwise respond to the Complaint in this action is extended to and including **August 12, 2024** to allow ERCOT additional time to investigate the allegations in the Complaint and consider an appropriate response. The Certain ERCOT Board Defendants, who have agreed to deem June 17, 2024 as the date for Plaintiff’s request for waiver of service of summons, agree to waive summons and service and shall also answer or otherwise respond to the Complaint by

August 12, 2024. This Joint Stipulation is made without waiver of any jurisdictional or other defenses that may be available to Defendants.

Dated: June 18, 2024

Respectfully submitted,

/s/ Eliyahu Ness

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Council of Texas, Inc., Paul Foster, Bill
Flores, Carlos Aguilar, Linda Capuano, Julie
England, Robert Flexon, Peggy Heeg, John
Swainson, and Pablo Vegas*

CERTIFICATE OF SERVICE

I hereby certify that on June 19, 2024, the foregoing document was electronically filed with the Clerk of Court using the Court's CM/ECF system, which will send notification of such filing to all counsel of record, including counsel of record for Plaintiff GH America Energy LLC.

/s/ Elliot Clark

Elliot Clark